

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

IN RE CATTLE AND BEEF ANTITRUST  
LITIGATION

No. 22-md-3031-JRT-JFD

THIS DOCUMENT RELATES TO:

*ALDI Inc. v. Cargill Inc., et al.*,  
Case No. 23-cv-05832 (N.D. Ill.)

**ALDI INC.’S NOTICE OF JOINDER IN DIRECT ACTION PLAINTIFFS’  
CONSOLIDATED COMPLAINT**

1. Pursuant to Amended Pretrial Order No. 3, dated February 3, 2023 (ECF No. 139), Plaintiff ALDI Inc. (“ALDI”), by and through undersigned counsel, hereby joins Direct Action Plaintiffs’ Consolidated Complaint, dated January 30, 2023 (ECF No. 132) (the “Consolidated Complaint”).

2. ALDI joins the Consolidated Complaint, adding the following to specify its causes of action as well as the Defendants in their action:

Direct Action Plaintiff Group	Plaintiff	Named Defendants	Cause of Action
ALDI	ALDI Inc.	Cargill, Inc., Cargill Meat Solutions Corporation (A/K/A Cargill Protein A/K/A Cargill Protein – North America), JBS S.A., JBS USA Food Company, Swift Beef Company, JBS Packerland, Inc., National Beef Packing Company, Tyson Foods, Inc., Tyson Fresh Meats, Inc.	Count I: 15 U.S.C. § 1  Count II: Violation of the Packers and Stockyard Act

3. ALDI adopts the following definition of “Beef:” “beef” includes boxed and case-ready meat processed by Defendants and other smaller, non-Defendant producers from fed cattle,

including primal cuts, trim or sub-primal products, further processed and value-added products, offal or variety products, and rendered products and by products. “Beef” also includes ground beef to the extent that it is processed, in whole or in part, from fed cattle. “Fed cattle” means steers and heifers raised in feedlots on concentrated diets to be produced and sold as beef.

Dated: September 26, 2023

Respectfully Submitted,

/s/ Elizabeth Parker

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 26, 2023, the foregoing Plaintiff ALDI Inc.'s Joinder Statement was served on all counsel of record in this action.

/s/ Elizabeth Parker

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